

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, ET AL., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee limited
liability company,

Defendants.

Case No. 2:23-cv-00630 JLR

**BRANDON REED'S RESPONSE TO
PLAINTIFFS' SUBPOENA**

Non-Party Brandon Reed responds to Plaintiffs' subpoena to him as follows:

Mr. Reed objects to the subpoena's demand for compliance by May 24, 2024, as the subpoena was not served until after that date.

Mr. Reed objects to Request 2 in the subpoena on the ground that the documents, to the extent they exist and are available, are more readily available from the Plaintiffs.

Mr. Reed objects to Requests 3 and 4 in the subpoena on the ground that the documents, to the extent they exist and are available, are more readily available from the Defendants.

Without waiving the foregoing objections, Mr. Reed responds that after a search that is reasonable under the circumstances, he has not located, and does not believe he has, any

1 responsive documents.

2 DATED July 15, 2024.

3 CORR CRONIN LLP

4 By: s/ Jack M. Lovejoy

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12 *Attorneys for Brandon Reed for the limited purpose*
13 *of accepting service of and providing this response*
14 *to the subpoena served on Mr. Reed by Plaintiffs*
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that the following is true and correct: that on July 15, 2024 I electronically served a copy of the documents to all counsel of record.

s/ Wen Cruz

Wen Cruz